

## Estate and Asset Protection Planning

# Trust Scams to Avoid

Buyer Beware is the best advice in the world of asset protection and tax avoidance schemes.

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### “SCAM TRUSTS”

Let's face it: We are all looking for “tax heaven”. Frankly, I wish it existed. If I had the ability to provide this to my clients in a legitimate fashion, I would be rich enough to retire in a couple of months. Many of you have called asking our opinion about what is known as “constitutional” “pure” and “contract” trusts. We have opined that you need to be very careful about setting these trusts up. While they sound like tax heaven, you could end up somewhere else! When in doubt, check with one of our attorneys about these trusts. Some recent news confirms our original beliefs

The most widespread asset protection scam is the Pure Trust scam, which involves a non-existing form of trust and – in attempt to keep one step ahead of law enforcement – goes by a variety of aliases, including Constitutional Trust, Patriot Trust, Common Law Trust, Business Trust, Common Law Trust Organization (COLATO), Foreign Common Law Trust Organization (FOCOLATO), and a bunch of other names.

It didn't take too long after the IRS announced it would vigorously attack fraudulent foreign and domestic trusts before the IRS backed up its bark with some bite. According to an article by Tax Analysts, during the first 11 months of its 2000 fiscal year, the teamwork between the CID (Criminal Investigation Division) of the IRS and

the Justice Department resulted in 35 indictments and 28 abusive trust convictions.

According to Mark E. Matthews, chief of the IRS's criminal investigation division, the CID concentrates mainly on promoters and clients who have "willfully used the promotion to egregiously evade tax". In other words, they are looking for truly fraudulent schemes. And finding them!

One such conviction involving a U.S. District Court case named Henderson illustrates that the folks who would never fall for such a scam do. The couple bilked almost 300 wealthy professionals. The charges against the Hendersons (punishable under federal law by more than nine years in prison) included conspiracy to defraud the IRS, aiding in the presentation of false tax returns by clients, and perjury.

What's so sad is that a modicum of basic tax law and common sense - which is all it would have taken by the scammed clients to see through the con – were outweighed by greed and wishful thinking. (A little like the pig who wished that everyone in the world would eat kosher).

It worked like this:

The Hendersons told their scamees - who purchased their "trust packages" – to transfer their businesses, homes, and other assets into the "trusts".

All the parties involved knew that the scamees never intended to give up an iota of control over

the assets they placed in trust - and in fact - as "managers of the trusts" - they really didn't.

Then, every outlay imaginable (home repairs, lawn care, house cleaning, you name it) was claimed as an expense of the trust and deducted.

And of course, the scamees also deducted the mortgage payments made by the trust and took depreciation deductions on the homes they had placed inside the trust. By passing trust losses through the trust into their personal tax returns, they claimed a negative income. Somehow, they had the chutzpah, after earning more than \$150,000, to claim an earned income credit.

But as Doctor Suess would say, "That was not all - no, no, that was not all." For their high income scamees, the Hendersons concocted a wonderful plan involving a circular flow of over \$1,000,000 of income from the clients to a series of bank accounts in the Caribbean and out to accounts controlled by the Hendersons and then (minus a 5% fee) back to the scamees. While all this financial plumbing was going on, the scamees "took deductions for the distribution of the funds to offshore entities, but didn't report the return of the funds."

Were the Hendersons true believers or true con artists? According to the IRS, they resisted audit efforts, didn't comply with IRS requests for information, and used cashier checks and numerous small accounts to hide their tracks.

Was this a small potatoes operation? In a five year period during which the Hendersons filed no returns and paid no taxes, trial evidence indicated that the Hendersons charged their bilkees more than \$1 million.

You may be wondering if the Courts have reserved their criminal penalties for the scammers and let the scamees slide. According to the Tax Analysts article, a Michigan dentist had his own fangs pulled and will get to wait for 27 months in a federal slammer for playing the abusive trust trick. (Did I mention he didn't think he needed to file a

return even though he pulled over a half million dollars worth of teeth?)

*Foreign Trusts With U.S. Owner*, must also be filed annually. Foreign trusts may be required to file other forms as well. Foreign trusts to which a U.S.

## **OTHER CREATIVE SCHEMES**

- **Asset Management Company** – In many promotions, taxpayers are advised to create Asset Management Companies (AMC's). The AMC, which lists the taxpayer as the director, is formed as a domestic trust. An individual on the promoter's staff is usually the trustee of the AMC, but this individual is quickly replaced by the taxpayer. The purpose of the AMC is to give the appearance that the taxpayer is not managing his or her business and to start the layering process.
- **Business Trust** - The next step is to form a business trust, also a domestic trust. In effect, the client elects to change the structure of their business from either a sole proprietorship or corporation to a trust. The AMC is the trustee of the business trust. False administrative expenses may be deducted from the trust as a means to reduce taxable income. The scheme gives the appearance that the taxpayer has given up control of their business to a trust; however, in reality the taxpayer is still running the day-to-day activities of their business and is controlling its income stream.
- **Equipment or Service Trust** - An equipment or service trust is formed to hold equipment that is rented or leased to the business trust, often at inflated rates. The business trust reduces its income by claiming deductions for payments to the equipment trust.
- **Family Residence Trust** – In some instances, taxpayers are being advised to distribute remaining income from the business trust to a family residence trust.

Family residences, including furnishings are transferred to this trust. These trusts sometimes rent the family residence back to the owner. These trusts may attempt to deduct non-allowable depreciation and the expenses of maintaining and operating the residence such as gardening, pool service, and utilities.

- **Charitable Trust** – In many promotions, the last layer of trusts is the charitable trust. These trusts or "charitable organizations" pay for personal, educational, or recreational expenses on behalf of the taxpayer or family members. The payments are then falsely claimed as "charitable" deductions on the trust tax returns. After the personal and non-allowable expenses are deducted from the charitable trust, any remaining balance of income, usually nominal amounts, is distributed to the taxpayer.

### Abusive Foreign Trust Schemes

Similar to the domestic arrangements, foreign packages usually start off with an AMC, a business trust, and distribute income to several trust layers. However, these foreign promotions also attempt to take funds offshore and outside U.S. jurisdiction. These schemes involve offshore bank accounts, trusts, and International Business Corporations (IBC's) created in "tax haven" countries.

A typical offshore trust scheme may have the following steps:

- **AMC** – As with the domestic arrangement, the first step in these schemes is for the taxpayer to form an AMC.
- **Business Trust** – The next step is to form the business trust, again very similar to the domestic scheme.
- **Foreign Trust One** – Next, a foreign trust is formed in a tax haven country, and the income from the business trust is distributed to this trust. For our purposes, this foreign trust will be referred to as "foreign trust one". In many cases, the AMC will be the trustee of foreign trust

one. Due to the fact that the source of the income is U.S. based and there is a U.S. trustee, this foreign trust has filing requirements as discussed above.

- **Foreign Trust Two** –The next step is to form a second foreign trust or "foreign trust two". All the income of foreign trust one is distributed to foreign trust two. Either foreign trust one or a foreign member of the promoter's staff becomes the trustee of foreign trust two. If the trustee is foreign trust one, the taxpayer still controls foreign trust two by the fact that he/she is in control of foreign trust one's trustee, by the directorship of the AMC. If a foreigner is the trustee of foreign trust two, the taxpayer is empowered by the promoter to overrule any decisions by this trustee. In either case, the taxpayer is in control of foreign trust two. *Promoters will claim to taxpayers that since the trustee and the source of income is now foreign, there are no U.S. filing requirements.* Promoters also advise taxpayers that since the trusts are formed in tax haven countries it is impossible for the IRS to determine who is in control of the trusts. In actuality, the taxpayer has never relinquished control of their business, but has set up, with the assistance of a promoter, an elaborate scheme to subvert and evade U.S. tax laws.

How do taxpayers involved in these schemes enjoy the fruits of their evasive scheme since their funds are offshore? There are several methods to repatriate the taxpayer's funds to the U.S. All of these methods, at some point, involve the opening of foreign bank accounts.

- One method is to open a foreign bank account in a tax haven country and then issue the taxpayer either a debit or credit card from the account. These debit or credit cards are used by the taxpayer in the U.S. to withdraw cash and to pay for everyday expenses, like groceries, medical bills, gasoline, and other miscellaneous expenses. Since these cards are issued from banks located in tax haven countries, it is very

difficult for the IRS to trace these transactions back to the taxpayer.

- Another method is to set up an International Business Corporation (IBC) and transfer the funds from the foreign trusts to the IBC via foreign bank accounts. Fraudulent loans are set up from the IBC to taxpayers and funds are wired back to the taxpayers in the U.S. Because purported loans are claimed non-taxable, the repatriation of funds is not reported on a U.S. tax return. In addition, because the ownership of IBC's is documented with bearer shares and IBC's are located in tax haven countries, it very difficult for the IRS to prove that fraudulent loans are actually the taxpayer's income.

### **CI's Efforts in Combating Abusive Trusts**

CI's enforcement strategy to combat these schemes is to focus primarily on promoters and on clients who have willfully used the promotion to egregiously evade tax. Further, fraudulent trust issues are addressed through a national strategy that includes CI, the IRS Examination and Collection Divisions, IRS Chief Counsel's Office, and the Department of Justice. As part of this strategy, emphasis is placed on multi-function coordination, the identification of fraudulent offshore promotions, and the use of civil and criminal enforcement actions.

It is very difficult to determine precisely the amount of fraud attributable to these schemes because of their design and inherent complexity. However, it can be said that these schemes are directed towards taxpayers with at least six figure incomes, and as evidenced by the individual cases detailed later in this summary, the potential for lost tax revenue could be massive.

Because this is a new area of fraud, CI has been tracking these investigations only since October 1998. The following statistics represent CI's efforts on promoters, clients, and other individuals involved in abusive trust schemes.

**CRIMINAL RECORD FOR ABUSIVE TRUST SCHEMES IN 2000**

	Fiscal Year 1999	Fiscal Year 2000	Fiscal Year 2001 as of 5/31/01
Criminal Investigations Initiated	67	47	65
Prosecution Recommendations	57	44	19
Indictments/Informations	35	53	29
Convictions	24	31	25
Incarceration* Rate	85.7%	93.1%	78.9%
Avg. Months to Serve (w/prison)	35	33	47
Avg. Months to Serve (all Sent)	30	31	37

\*Incarceration may include prison time, home confinement, electronic monitoring, or a combination thereof. Fiscal Year 2001, runs October 1, 2000, through September 30, 2001.

The following data is on foreign and domestic trusts investigations as of February 28, 2001.

Open Criminal Investigations	136
Percent of Open Investigations on Foreign Schemes	64%
Percent of Open Investigations on Domestic Schemes	36%

## Significant Cases

### Henderson Investigation

On February 22, 2001, Dorothy and George Henderson, of Roseville, California, were sentenced to lengthy prison terms in connection 78 months in prison, followed by 3 years supervised release, and ordered to pay costs of \$4,094.47 and an assessment of \$400. [U.S. Attorney's press release]

On September 26, 2000, Dorothy and George Henderson were convicted of conspiracy to defraud the Internal Revenue Service, and three counts of aiding in the presentation of false tax returns by their clients to the IRS. Dorothy Henderson was also convicted on two counts of perjury for lying before a federal grand jury.

The evidence presented at trial established that the Hendersons from 1993 through 1998, operating through an entity called "G&D Associates," sold packages of bogus trusts to their clients and advised the clients on how to generate false tax deductions. As part of the scheme, clients transferred their businesses, homes and other assets into trusts, but did not relinquish control of the assets after the transfer. On federal income tax returns, clients claimed various personal expenses, such as home repairs, pool maintenance, lawn care and house cleaning, as deductible expenses of the trusts. Clients also deducted mortgage payments, including principal, and depreciated the value of their residences and distributed these payments to their personal tax returns, often resulting in negative taxable income. In accordance with the scheme, some clients who made in excess of \$150,000 per year claimed Earned Income Tax Credit on their personal returns.

For higher income clients, the Hendersons operated another scheme to conceal additional income from the IRS by passing client income through a series of bank accounts in the U.S. and various tax haven countries in the Caribbean. The funds that flowed through these accounts were ultimately transferred back to clients less a 5% fee. On their tax returns, clients took deductions for the distribution to the offshore accounts, but did not report the return of the funds.

with a massive conspiracy to defraud the IRS. Dorothy Henderson received 135 months in prison, followed by 3 years supervised release, and ordered to pay the costs of \$4094.47 and an assessment of \$600. George Henderson received

The evidence also revealed that that the Hendersons earned over \$1 million in fees from their clients during the course of marketing the scheme from 1994 through early 1998. The Hendersons filed no tax returns and paid no taxes during that period. After the guilty verdict, the judge in the case immediately remanded the Hendersons into custody. In making that ruling, the judge stated that the Hendersons were an economic danger to the community and had demonstrated a disregard for the law.

This investigation arose out of an earlier investigation of Ronald Chappell, Todd Gaskill, Martin Goodwill and Lloyd Winburn. The defendants in the previous investigation were sentenced to prison terms ranging from 37 to 87 months.

### Modena, et al., Investigation

On November 22, 2000, John Modena was sentenced to 60 months imprisonment for conspiracy to commit income tax evasion for creating and promoting "sham" trusts in an attempt to insulate income and assets from the federal government.

During the course of the conspiracy, Modena assisted brothers Denver Russell, Daniel Russell, Jack Russell, Orval Russell, and Timothy Russell in evading income taxes in excess of \$3 million over a four-year period. As part of the scheme, the Russells, who were involved in the metal die cast business, did not use personal bank accounts, relied on cash, rescinded social security numbers and birth certificates, and used business trusts to conduct personal business and make personal purchases.

The Russells received sentences ranging from 33 months to 54 months imprisonment for their role in the scheme.

### Sather Investigation

Ronald Sather, of McAlester, Oklahoma, was sentenced to 35 months imprisonment on November 3, 1999, for corruptly interfering with the IRS, failing to file federal income tax returns, evading bank reporting requirements, bankruptcy fraud, and fraudulently using a social security number. Sather was convicted by a jury of these violations in connection to his "get out of the tax system" scheme. According to the indictment, Sather was a member of the Pilot Connection, an organization involved in promoting "untaxing packages".

As part of his scheme, Sather formed several trusts including a business and equipment trusts for his chiropractic practice. Sather established several bank accounts for his business in trust names and removed his name from several properties he owned, including his chiropractic practice, in a further attempt to conceal his activities from the IRS. Sather also instructed his office staff to destroy his business computer system with a "ZAP" program if the IRS attempted to look at his records.

During the years 1992-1994, Sather failed to file federal income tax returns that should have shown income in excess of \$600,000. In addition to his imprisonment, Sather was ordered to pay restitution to the IRS in excess of \$133,000.

### Rois and Reinke Investigation

On October 12, 2000, Glenn L. Rois, of Benson, Minnesota, and Faye S. Reinke, of Sacred Heart, Minnesota, were sentenced to 46 months imprisonment and six months incarceration in a halfway house, respectively, for their involvement in marketing illegal trusts in the Midwest. A jury convicted Rois and Reinke on all counts on June 1, 2000, for conspiracy to defraud the IRS. In addition, Rois was convicted of submitting false returns to the IRS.

For the period of 1988 to 1996, Rois and Reinke marketed trusts to taxpayers by asserting that trusts were separate entities and therefore allowed taxpayers to claim that the trusts earned income, rather than the individuals or businesses. In addition, Rois and Reinke claimed that taxpayers

could deduct all their personal living expenses, including food, clothing, lodging, and vacations, because they were managing the trusts. Evidence at trial established that Rois and Reinke typically charged over \$1,500 for creating trust documents. In both 1994 and 1995, Rois received in excess of \$100,000 from trusts he marketed with Reinke. Rois failed to report this income on his 1994 and 1995 federal income tax returns. Witnesses at trial testified that Rois and Reinke instructed them to lie to the IRS about who created the trusts. Witnesses also testified that Rois and Reinke backdated certain trust documents and switched other trust documents when they learned of impending audits of their clients. When questioned about his role in selling trusts, Rois denied that he sold trusts or prepared trust documents and in fact claimed that he was a consultant to farmers on the best crops to grow. Reinke also denied selling trusts and claimed that she accompanied Rois on his consulting work with farmers and advised people on health issues.

### Hotchkiss Investigation

On September 27, 2000, Lyle Hotchkiss, a Michigan dentist, was sentenced to 27 months of imprisonment for failing to file federal income tax returns and tax evasion for the years 1993 through 1996. During those years, Hotchkiss failed to report to the Internal Revenue Service over \$1.5 million in taxable income.

As part of his scheme to evade federal income tax, Hotchkiss deposited receipts from his dental practice into fraudulent trusts. The judge in the case found that the trusts used by Hotchkiss were shams that were used for tax evasion and to funnel money out of the country. The judge found that Hotchkiss "parked" over \$100,000 in a Bahamas bank account as part of his scheme to conceal the funds.

In addition to imprisonment, the judge fined Hotchkiss \$10,000 and sentenced him to place a full one-page advertisement, at his own expense, in the Grand Rapids Press. The judge required Hotchkiss to explain that he has been sentenced to 27 months imprisonment for not paying his taxes, that other people should pay their taxes and that previous statements he made in the paper

supporting his scheme were wrong. This advertisement was placed in the paper by Hotchkiss on December 14, 2000.

#### Morris Investigation

In July 1999, James C. Morris of Cincinnati, Ohio was sentenced to 24 months imprisonment followed by 3 years of supervised release for tax evasion and for attempting to interfere with the administration of the IRS. Morris, who pleaded guilty, admitted that he did not file a Federal income tax return or pay substantial tax due and owing for 1992 on the sale of certificates of deposit. As part of his scheme, Morris used nominee trusts to conceal his income and assets from the IRS. Morris admitted he impeded the IRS by selling sham trusts that were used to conceal assets and income from the IRS and others. Morris also admitted he was a member of the Pilot Connection Society and later its successor, the Liberty Foundation, an organization that sold so-called "untaxing packages" and assisted its members in circumventing the filing of Federal income tax returns and payment of Federal income tax. Morris sold these "untaxing packages" and sham trusts through his business, Excellence in Planning Associates. In addition to imprisonment, the judge ordered Morris to pay a \$5,000 fine and restitution to the IRS in the amount of \$41,686.

#### Bradley Investigation

In June 1999, Edgar Bradley and his sons, Edgar Bradley II and Roy Bradley, were sentenced to 60, 57, and 46 months imprisonment followed by 3 years supervised release, respectively for conspiracy to defraud the IRS and for failing to file tax returns. In an attempt to conceal income, the Bradleys, who were found guilty by a Federal jury, assigned their income to several nominees and purported irrevocable trusts that had no economic substance. As part of the conspiracy, the Bradleys used several bank accounts opened in trust and other names to conceal insurance commission receipts and proceeds from the sale of certificates of deposit and coins. The Bradleys also attempted to conceal their assets from the IRS by the conveyance of real property from their names to purported trusts and nominees. In addition to their imprisonment, the judge in the case ordered the

Bradleys to pay fines of \$413,500 and restitution in excess of \$635,000 to the IRS.

#### Chappell, et al. Investigation

In May 1999, Ronald Chappell, a former CPA from Roseville, California, was sentenced to 87 months imprisonment for defrauding the IRS by promoting bogus trusts. In addition to Chappell, Todd Gaskill, an attorney, Martin Goodrich, and Lloyd Winburn, a former legislative aide in Sacramento, were sentenced to 58, 37, 63 months imprisonment respectively, for their involvement in the scam. The men sold packages of bogus trusts to clients and advised them how to use trusts to generate fraudulent tax deductions. Clients of these individuals put businesses, homes, and other assets in trusts, but in fact continued to control those assets. Clients claimed various personal expenses related to the bogus trusts on their tax returns including depreciation of personal residences, lawn care, house cleaning, and scholarships for their children.

In another scheme directed at high income taxpayers, Chappell, Gaskill, and Goodrich instructed clients to conceal income from the IRS through a series of bank accounts in the U.S. and the Caribbean. The judge in the case found that the trust scheme deprived the federal and state governments of more than \$2.5 million in tax revenue.

#### Rivera Investigation

In January 1999, Pedro Ivan Rivera, a physician in Carrollton, Texas, was sentenced to 37 months imprisonment followed by three years supervised release and ordered to pay \$414, 819 in restitution to the IRS for tax evasion for the years 1992 to 1996. Rivera created trusts, including one for his family residence, that he controlled and used to conceal his income. In addition, Rivera transferred funds between trusts, offshore corporations, and their corresponding bank accounts located in the U.S., Bahamas, and the Channel Islands in order to conceal taxable income.

#### Civil and Criminal Penalties

Investors of abusive trust schemes that improperly evade tax are still liable for taxes, interest, and

civil penalties. Violations of the Internal Revenue Code with the intent to evade income taxes may result in a civil fraud penalty or criminal prosecution. Civil fraud can include a penalty of up to 75% of the underpayment of tax attributable to fraud, in addition to the taxes owed. Criminal convictions of promoters and investors may result in fines up to \$250,000 and up to five years in prison. Criminal statutes that maybe applicable are as follows:

- Title 18 USC 371, Conspiracy to Defraud the IRS
- Title 26 USC 7201, Tax Evasion
- Title 26 USC 7206 (1), Subscription to a False Tax Return
- Title 26 USC 7206(2), Aiding or Assisting in a False Tax Return
- Title 26 USC 7212(a), Corrupt or Forcible Interference with the Administration of Internal Revenue Laws
- Title 31 USC 5314, Records and Reports on Foreign Financial Agency Transactions

There are a number of groups of people marketing "Pure Trusts" and "Pure Contract Trusts." Be advised that these are, without exception, invalid trust arrangements which will succeed in nothing more than scamming innocent purchasers out of their money. These faulty instruments are frequently advocated by individuals with an anti-IRS agenda.

**Trusts are Generational.** This means that trusts must be prepared under the state law of the domicile of the trust. Laws, particularly tax laws, change from time to time. These changes can affect what trusts can and cannot do. Some "Pure Trust" advocates appeal to "Common Law" as if it is distinct from legislated legal codes. There are not two types of law where you can choose one over the other. The legislated law is the common law of the state including modifications made from time to time. A trust, fully valid in 1918 may not

be valid today under existing laws. Hence, no reproductions of that trust would be valid.

**Trust Standards.** Trusts must be written under the existing state laws governing trusts. Trusts must also correspond to existing state and federal tax laws. Some "Pure Trust" advocates appeal to court decisions of the past. A court decision is not permanent. In the past those trusts were measured against existing laws as are new trusts today. In the past trusts could do things which are not allowed today. We live in 1998 not 1798.

**"A Trust written in the form of a Contract."** Some "Pure Trust" advocates appeal to the U.S. Constitution (Article I, Sec. 15) for this. This is a total misunderstanding of this section which simply says that states cannot pass laws impairing the obligation of contracts. All states have laws concerning contracts. An instrument is as an instrument does. If it looks like a trust, owns property held in trust for another, or works like a trust - then it is a trust, regardless of what it calls itself, and comes under existing tax laws.

**Why These Trusts Fail.** Generally, these trusts fail for two reasons:

**1. The Doctrine of Merger.** Nearly all Pure Trusts are irrevocable separate trust estates with their own IRS EIN number. However, if the creator of the trust has even the smallest interest or control in the trust property or administration, directly or indirectly, of the trust, that trust forfeits its separate estate status and reverts to being the property of the creator.

**2. Fraudulent Transfers.** Nearly all Pure Trusts exchange certificates from the trust for property and assets of the creator. The property and assets have an ascertainable present value prior to the trade. The certificates have no present ascertainable value. Hence, items are exchanged for worthless certificates. This is a violation of the IRS Code in Sec. 1031 which specifically bans these exchanges.

The IRS position is simply that these fraudulent trusts simply do not exist and is why they are not recognized. There have been over 150 court cases involving them and, as yet, none has been

victorious. Some Internet postings cite an "IRS letter stating that Pure Trusts are tax exempt." What this means is that the IRS does not recognize the Pure Trust as an entity separate from the creator - it is treated as a living revocable trust - and the creator is responsible for all taxes.

**Finally.** Under our legal system, there is no legal way to own and or manage your assets and keep it totally protected from either law suits or taxes. This is an underlying myth that such an arrangement can be made. Ours is a society of legal equity. If someone harms another they can be held responsible and be ordered to pay restitution. If Pure Trusts were valid, no one would pay taxes nor be able to lose their assets as the result of a personal lawsuit.

***Pure Trusts, et. al., are not a matter of opinion - they fail as a rule of law.***

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